

January 7, 2025

VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Alexander et al.*, Docket No. 24-CR-00676 (VEC)

Dear Judge Caproni:

On behalf of defendants Tal Alexander and Alon Alexander, we submit this letter respectfully requesting that the Court extend the defendants' respective stays of removal to the Southern District of New York through the date of the hearing on their appeals of their detention orders. We make this request so that undersigned counsel can continue to communicate with the defendants to prepare for this upcoming hearing. We understand that if the defendants are removed, it may be difficult to communicate with them while they are in transit, and that the period of transit may comprise a substantial portion of the next week or longer. As we have previously stated, we intend to waive their appearances at the hearing. The government takes no position on this motion.

Tal Alexander previously requested that this Court stay removal from the Southern District of Florida on December 24, 2024 (ECF No. 9), which the Court granted through the earlier of January 6, 2025 or when removal was ordered for either of the codefendants in this matter (ECF No. 13). With respect to Alon Alexander, the Honorable Magistrate Judge Eduardo I. Sanchez in the Southern District of Florida granted Alon Alexander's request to stay removal through January 7, 2025. *See* 24-MJ-04616 (EIS), ECF No. 23 (S.D. Fla.).

Thank you for your consideration.

Respectfully submitted,

/s/ Milton L. Williams

Milton L. Williams
Deanna Paul
Alexander Kahn
Walden Macht Haran & Williams LLP
250 Vesey Street, 27th Floor
New York, New York 10281
Attorneys for Defendant Tal Alexander

/s/ Howard Srebnick

Howard Srebnick (*Pro Hac Vice*
Forthcoming)

Black Srebnick, P.A.

201 South Biscayne Boulevard

Suite 1300

Miami, FL 33131

HSrebnick@RoyBlack.com

Attorney for Defendant Alon Alexander

cc: All counsel via ECF